

FEDERAL DEFENDER SERVICES
OF WISCONSIN, INC.

LEGAL COUNSEL

Craig W. Albee, Federal Defender
Krista A. Halla-Valdes, First Assistant

Joseph A. Bugni, Madison Supervisor
John W. Campion
Anderson M. Gansner
Gabriela A. Leija
Peter R. Moyers
Ronnie V. Murray
Tom E. Phillip
Joshua D. Uller
Kelly A. Welsh

22 East Mifflin Street
Suite 1000
Madison, Wisconsin 53703

Telephone 608-260-9900
Facsimile 608-260-9901

April 9, 2021

Honorable Stephen L. Crocker
United States Magistrate Judge
120 North Henry Street
Madison, Wisconsin 53703

Re: *United States v. Steven Robeson*
Case No. 21-cr-24-wmc

Dear Judge Crocker:

This letter concerns the government's motion for a protective order. I am still on paternity leave and cannot substantively respond to the government's motion by Tuesday. So after consultation with the government, I would propose the following.

First, that the Court grant the government's motion for a protective order. That will allow the defense to get the discovery and review it. Second, once I return to work and have an opportunity to review the discovery, I can file a motion to vacate or dissolve the protective order. But until that motion is filed (and ruled upon) the protective order will govern.

Proceeding in this manner ensures that the case is not delayed and makes sure that neither side is prejudiced. It also avoids looking for trouble. Again, I have spoken with AUSA Elizabeth Altman and she has no objection to proceeding in this manner.

FEDERAL DEFENDER SERVICES
OF WISCONSIN, INC.

Honorable Stephen L. Crocker
April 9, 2021
Page -2-

Thank you for your attention to this matter.

Sincerely,

/s/ Joseph A. Bugni

Joseph A. Bugni
Associate Federal Defender